

Exhibit A

From: [Shen, Andrew C.](#)
To: ["Emily Kirsch"](#)
Cc: [Gabrielle Friedman](#); [Young, Christopher M.](#); [Brice Jastrow](#)
Subject: RE: In re: 9/11
Date: Thursday, October 14, 2021 1:38:52 PM

Gabi & Brice –

Thank you for circulating an invite. In advance of our call, here is our proposal for a search of Mr. Fawcett's computer. I look forward to discussing at 4:30.

- 1) Forensic report showing folder structure / file names.
- 2) Forensic report reflecting any documents deleted from June 1, 2021 to the present (showing file name and when document was deleted).
- 3) Production of any documents deleted from June 1, 2021 to the present that are forensically recovered.
- 4) Forensic search and production of any version of the Jarrah, Bayoumi, Thumairy deposition transcript (including in deleted files)
- 5) Forensic search and production of any communications sent or received from June 1, 2021 to the present through John Fawcett's ProtonMail account.
- 6) Forensic search and production of all communications from June 1, 2021 to the present between (1) John Fawcett, and (2) Jim Kreindler, Megan Bennet, Duke Maloney, Steve Pounian, Catherine Hunt, Michael Isikoff (or anyone acting on his behalf), or any member of the press.
- 7) Forensic search and production of all documents created or modified between June 1, 2021 and the present that hit upon the following search terms: Isikoff, Issikoff, Isikof, *@yahoo-inc.com, *@oath.com, misikoff@verizonmedia.com, misikoff52@gmail.com, mj061821*, mj061721*, *protonmail*, *Jarrah, *Jarrah, *Jarrah, *Mussaed, *Musaed, conspiracyland, conspiracy land, Bayoumi, Thumairy, Netburn.

Thanks,

Andy

From: Emily Kirsch <emily.kirsch@kirschniehaus.com>
Sent: Thursday, October 14, 2021 8:52 AM
To: Shen, Andrew C. <ashen@kellogghansen.com>
Cc: Gabrielle Friedman <GFriedman@lswlaw.com>; Young, Christopher M. <cyoung@kellogghansen.com>; Brice Jastrow <bjastrow@lswlaw.com>
Subject: [EXTERNAL] Re: In re: 9/11

I am available at 4:30.

Emily Kirsch
Sent from my iPhone

On Oct 13, 2021, at 11:53 PM, Shen, Andrew C. <ashen@kellogghansen.com> wrote:

Gabi –

Nice to meet you as well. We could do a call at 4:30pm. Does that work?

Thanks,

Andy

From: Gabrielle Friedman <GFriedman@lswlaw.com>
Sent: Wednesday, October 13, 2021 10:12 PM
To: Shen, Andrew C. <ashen@kelloggghansen.com>
Cc: Young, Christopher M. <cyoung@kelloggghansen.com>; Brice Jastrow <bjastrow@lswlaw.com>; 'Emily Kirsch' <emily.kirsch@kirschniehaus.com>
Subject: [EXTERNAL] RE: In re: 9/11

Hi Andy,

Nice to meet you by email.

I am available tomorrow after 3 PM for a call.

Thanks for copying Emily Kirsch on your email. I trust we can find a time that works for all three of us.

Regards,

Gabi

Gabrielle S. Friedman
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gfriedman@lswlaw.com | www.lswlaw.com

From: Shen, Andrew C. <ashen@kelloggghansen.com>
Sent: Wednesday, October 13, 2021 6:20 PM
To: Gabrielle Friedman <GFriedman@lswlaw.com>; 'Emily Kirsch' <emily.kirsch@kirschniehaus.com>
Cc: Young, Christopher M. <cyoung@kelloggghansen.com>
Subject: In re: 9/11

Ms. Friedman –

I represent Saudi Arabia in the 9/11 litigation. Are you available tomorrow morning at 10AM eastern for a call to discuss the search and production of materials from Mr. Fawcett's

computer?

I've copied counsel for the Kreindler firm, Emily Kirsch, on this email as well.

Thanks,

Andy

Andrew C. Shen
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